

REMARKS

Claims 1-70 were previously pending in this application. By this amendment, claims 18, 39, 42 and 68 have been amended to correct several errors discovered by Applicants. These amendments are not believed to narrow the scope of the claims. Claims 55-63 have been canceled as a result of a Restriction Requirement. As a result, claims 1-54 and 64-70 are pending for examination with claims 1, 18, 25, 29, 39, 44, 50, and 64-70 being independent claims. No new matter has been added.

Rejections Over U.S. Patent No. 5,815,619 to Bloom

35 U.S.C. §102 (b)

Claims 1-4, 8, 13, 15 and 64 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,815,619 to Bloom. Applicants respectfully traverse these rejections.

In the Office Action, the Examiner makes no attempt to identify those features of Bloom that purportedly anticipate the claims. Rather, the Examiner merely asserts that the above-referenced claims, including independent claims 1 and 64, are "clearly anticipated by Bloom." Applicants respectfully disagree as discussed below.

Bloom is generally directed to an arrangement for sealing an optical fiber within a fiber optic connector. As illustrated in Fig. 5, an exposed portion 205 of the optical fiber 10a is positioned within a throughbore of a ferrule, and a metal seal 208 is added between the ferrule and the outer diameter of the optical fiber to form a bond between the ferrule and the optical fiber. (see Bloom Abstract).

Claims 1-4, 8, 13 and 15

Claim 1 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises a carrier for supporting a connector that, responsive to a control signal, is moveable in at least two axial directions and is rotatable, and a support for holding the fiber so that the fiber portion is available to receive the connector.

As shown in Figs. 3A-3B of Bloom, a ferrule 200 is moved by a clamp 180 from a ferrule feeder 174 into a receiving position adjacent to and aligned with a splicer/cutter 172. (Bloom, col. 4, lines 34-43). An alignment collar 178 is then moved into position for receiving and

guiding the optical fiber 10a into the ferrule 200. (Bloom, col. 4, lines 43-45). Although Bloom discloses moving a ferrule with a clamp 180, Bloom does not teach or suggest a carrier for supporting a connector that, responsive to a control signal, is moveable in at least two axial directions and is rotatable as recited in claim 1. Accordingly, the rejection of independent claim 1 over Bloom under §102 is improper and should be withdrawn.

Claims 2-4, 8, 13 and 15 depend from claim 1 and are patentable for at least the same reason.

Claim 64

Claim 64 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises means for supporting the connector that, responsive to a control signal, is moveable in at least two axial directions and is rotatable, and means for holding the fiber so that the fiber portion is available to receive the connection.

As discussed above, Bloom discloses a clamp 180 for moving a ferrule 200. However, Bloom does not teach or suggest means for supporting a connector that, responsive to a control signal, is moveable in at least two axial directions and is rotatable as recited in claim 64. Accordingly, the rejection of independent claim 64 under §102 is improper and should be withdrawn.

35 U.S.C. §103(a)

Claims 5-7, 9-12, 14, 16-54 and 65-70 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bloom. Applicants respectfully traverse these rejections.

The Examiner has set forth no basis in the Office Action for rejecting the claims as being unpatentable in view of Bloom. In this regard, the Office Action provides no indication as to the relationship between the teachings of Bloom and the limitations of the pending claims except for a few of the claims. As discussed below, each of the independent claims recites a feature not disclosed by Bloom. Not only has the Examiner failed to even establish that these features are disclosed in the art, but the Examiner has failed to establish any motivation based on the teachings and suggestions in the prior art to modify Bloom to include such features. Therefore,

the Examiner has failed to establish a *prima facie* case of obviousness, such that the rejections are improper and should be withdrawn, as discussed below.

Claims 5-7, 9-12, 14 and 16-17

Claims 5-7, 9-12, 14 and 16-17 depend from claim 1 and are patentable for at least the same reasons set forth above regarding claim 1.

Claims 18-24

Claim 18 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a detector for determining an alignment of a polarization maintaining axis of a fiber, and a carrier for supporting a connector that, responsive to a control signal, orients the connector into a position that corresponds with the alignment of the polarization maintaining axis of the fiber.

Applicants respectfully traverse the rejection of claim 18. In the Office Action, the Examiner has provided no basis for the rejection of claim 18 as being unpatentable under §103 in view of Bloom. Bloom does not teach or suggest a detector for determining an alignment of a polarization maintaining axis of the fiber as recited in claim 18. Bloom also does not teach or suggest a carrier that, responsive to a control signal, orients the connector into a position that corresponds with the alignment of the polarization maintaining axis of the fiber as further recited in claim 18. As discussed above, Bloom discloses a clamp 180 that moves a ferrule 200 from a ferrule feeder 174 into a receiving region adjacent a splicer/cutter 172.

In the Office Action, not only has the Examiner failed to establish the existence of these features in the art, but the Examiner has also failed to establish any motivation based on teachings or suggestions in the prior art to modify Bloom to include these features. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 18 as being unpatentable over Bloom under §103 is improper and should be withdrawn.

Claims 19-24 depend from claim 18 and are patentable for at least the same reasons.

Claims 25-28

Claim 25 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a heater, responsive to a control signal, that directs heat into a fiber working area to at least pre-set an adhesive that has been included in the connector.

Applicants respectfully traverse the rejection of claim 25. In the Office Action, the Examiner has provided no basis for the rejection of claim 25 as being unpatentable under §103 in view of Bloom. Bloom does not teach or suggest a heater, responsive to a control signal, that directs heat into a fiber working area to at least pre-set an adhesive that has been included in the connector as recited in claim 25. The Examiner has failed to establish that such a heater is known in the art. The Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Bloom to include such a feature, even if it is known in the art. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 25 under §103 is improper and should be withdrawn.

Claims 26-28 depend from claim 25 and are patentable for at least the same reasons.

Claims 29-38

Claim 29 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a heater for at least pre-setting the adhesive filled connector at a heating location.

Applicants respectfully traverse the rejection of claim 29. In the Office Action, the Examiner contends that it would have been obvious to modify Bloom to include an adhesive dispenser. Without acceding to the propriety of this proposed modification, Applicants respectfully submit that, as discussed above, Bloom does not teach or suggest a heater for at least pre-setting the adhesive filled connector at a heating location or an adhesive dispenser for filling a connector with adhesive at an adhesive dispensing location as recited in claim 29. In the Office Action, not only has the Examiner failed to establish that such a heater is known in the art, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Bloom to include such a feature, even if it is known in the art. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 29 under §103 is improper and should be withdrawn.

Claims 30-38 depend from claim 29 and are patentable for at least the same reasons.

Claims 39-43

Claim 39 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a hold down member, responsive to a control signal, that is moveable from a first position that holds a tray in a receiving area to a second position that releases the tray in the receiving area.

Applicants respectfully traverse the rejection of claim 44. In the Office Action, the Examiner has provided no basis for the rejection of claim 39 as being unpatentable over Bloom. There is no teaching or suggestion in Bloom of a hold down member that is moveable from a first position that holds a tray in a receiving area to a second position that releases the tray in the receiving area as recited in claim 39. The Examiner has failed to establish that such a feature is known in the art. The Examiner has also failed to establish any motivation based on any teachings or suggestions from the prior art to modify Bloom to provide such a feature. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 39 under §103 is improper and should be withdrawn.

Claims 40-43 depend from claim 39 and are patentable for at least the same reasons.

Claims 44-49

Claim 44 is directed to an automated station for attaching a connector in a pre-determined orientation to a portion of a fiber. The station comprises, *inter alia*, a carrier adapted to support the connector, and a system for detecting a first orientation of a connector. The carrier, responsive to a control signal, is moveable to position the connector in the pre-determined orientation.

Applicants respectfully traverse the rejection of claim 44. Bloom does not disclose or suggest a system for detecting a first orientation of a connector. In the Office Action, not only has the Examiner failed to establish that such a system is known in the art, but the Examiner has also failed to establish a motivation based on the teachings and suggestions from the prior art to modify Bloom to include such a system, even if it is known in the art. Accordingly, the

Examiner has failed to set forth a *prima facie* case of obviousness such that the rejection of independent claim 44 under §103 is improper and should be withdrawn.

Claims 45-49 depend from claim 44 and are patentable for at least the same reasons.

Claims 50-54

Claim 50 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, a support adapted to hold the fiber so that the fiber portion is available to receive the connector, and a carrier adapted to support a connector that, responsive to a control signal, is moveable along a fiber portion in a path including a fiber support. The fiber support, responsive to a control signal, moves out of the path of the carrier after the carrier has been moved to a pre-determined length along the path.

Applicants respectfully traverse the rejection of claim 50. In the Office Action, the Examiner has provided no basis for the rejection of claim 50 as being unpatentable over Bloom. Bloom discloses a fiber portion being moveable through a throughbore 204 of a ferrule 200. As described in Bloom, the optical fiber 10a is released from the splicer/cutter 172 which allows the clamp 176 to move the cut end of the optical fiber into the ferrule 200. (col. 4, lines 46-50). Bloom does not teach or suggest a carrier adapted to support a connector that, responsive to a control signal, is moveable along a fiber portion in a path including a fiber support as recited in claim 50. Bloom also does not teach or suggest a fiber support that, responsive to a control signal, moves out of the path of the carrier after the carrier has been moved a pre-determined length along the path as further recited in claim 50. The Examiner has failed to establish that these features are known in the art. The Examiner has also failed to establish any motivation based on any teachings or suggestions from the prior art to modify Bloom to include these features. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness such that the rejection of independent claim 50 under §103 is improper and should be withdrawn.

Claims 51-54 depend from claim 50 and are patentable for at least the same reasons.

Claim 65

Claim 65 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, means for determining an alignment of a polarization

maintaining axis of a fiber and means for supporting a connector that, responsive to a control signal, orients the connector into a position that corresponds with the alignment of the polarization maintaining axis of the fiber.

Applicants respectfully traverse the rejection of independent claim 65. In the Office Action, the Examiner has provided no basis for the rejection of claim 65 as being unpatentable under §103 in view of Bloom. There is no teaching or suggestion in Bloom of means for determining an alignment of a polarization maintaining axis of a fiber as recited in claim 65. Bloom also does not teach or suggest means for supporting a connector that, responsive to a control signal, orients the connector into a position that corresponds with the alignment of the polarization maintaining axis of the fiber as further recited in claim 65. In the Office Action, not only has the Examiner failed to establish the existence of these features in the art, but the Examiner has also failed to establish any motivation based on teachings or suggestions from the prior art to modify Bloom to include these features. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 65 under §103 is improper and should be withdrawn.

Claim 66

Claim 66 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, means, responsive to a control signal, that directs heat into a fiber working area to at least pre-set an adhesive that has been included in the connector.

Applicants respectfully traverse the rejection. In the Office Action, the Examiner has provided no basis for the rejection of claim 66 as being unpatentable under §103 over Bloom. Bloom does not teach or suggest means, responsive to a control signal, that directs heat into a fiber working area to at least pre-set an adhesive that has been included in the connector as recited in claim 66. In the Office Action, not only has the Examiner failed to establish that this feature is known in the art, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Bloom to include this feature. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 66 under §103 is improper and should be withdrawn.

Claim 67

Claim 67 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a heater for at least pre-setting an adhesive filled connector at a heating location, and means for supporting the connector that is moveable, responsive to one or more control signals, to a connector supply location, an adhesive dispensing location and the heating location.

Applicants respectfully traverse the rejection of claim 67. In the Office Action, the Examiner contends that it would have been obvious to modify Bloom to include an adhesive dispenser. Applicants respectfully disagree. As discussed above, Bloom does not teach or suggest a heater for at least pre-setting an adhesive filled connector at a heating location as recited in claim 67. Bloom also does not teach or suggest means for supporting a connector which is moveable, responsive to one or more control signals, to an adhesive dispensing location and a heating location as further recited in claim 67. The Examiner has failed to establish that these features are known in the art. The Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Bloom to include these features, even if they are known in the art. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 67 under §103 is improper and should be withdrawn.

Claim 68

Claim 68 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, means for holding a tray in a receiving area that, responsive to a control signal, is moveable from a first position that holds the tray in the receiving area to a second position that releases the tray in the receiving area.

Applicants respectfully traverse the rejection of claim 68. In the Office Action, the Examiner has provided no basis for the rejection of claim 68 as being unpatentable over Bloom. Bloom does not teach or suggest means for holding a tray in a receiving area that is moveable from a first position that holds the tray in the receiving area to a second position that releases the tray in the receiving area as recited in claim 68. In the Office Action, not only has the Examiner failed to establish the existence of this feature in the art, but the Examiner has also failed to

establish any motivation based on teachings or suggestions in the prior art to modify Bloom to include this feature. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 68 under §103 is improper and should be withdrawn.

Claim 69

Claim 69 is directed to an automated station for attaching a connector in a pre-determined orientation to a portion of a fiber. The station comprises, *inter alia*, means for detecting a first orientation of a connector and means for supporting the connector that, responsive to a control signal, is moveable to position the connector in a pre-determined orientation.

Applicants respectfully traverse the rejection of claim 69. In the Office Action, the Examiner has provided no basis for the rejection of claim 69 as being unpatentable under §103 in view of Bloom. Bloom does not disclose any means for detecting an orientation of a connector as recited in claim 69. Bloom also does not teach or suggest any means for supporting a connector that, responsive to a control signal, is moveable to position the connector in a pre-determined orientation as further recited in claim 69. In the Office Action, not only has the Examiner failed to establish the existence of these features in the art, but the Examiner has also failed to establish any motivation based on teachings or suggestions from the prior art to modify Bloom to include these features. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 69 under §103 is improper and should be withdrawn.

Claim 70

Claim 70 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, means for supporting a connector that, responsive to a control signal, is moveable along a fiber portion in a path including means for holding the fiber. The means for holding the fiber, responsive to a control signal, moves out of the path of the means for supporting after the means for supporting has been moved a pre-determined length along the path.

Applicants respectfully traverse the rejection of claim 70. In the Office Action, the Examiner has provided no basis for the rejection of claim 70 as being unpatentable under §103 in view of Bloom. As discussed above, Bloom teaches moving the end of an optical fiber into a throughbore 204 of a ferrule 200 (see col. 4, lines 45-50). Bloom does not teach means for supporting a connector that, responsive to a control signal, is moveable along a fiber portion in a path including means for holding the fiber as recited in claim 70. Bloom also does not teach or suggest means for holding a fiber that moves out of the path after the means for supporting has moved a pre-determined length along the path as further recited in claim 70. In the Office Action, the Examiner has failed to establish that these features are known in the art. The Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior to modify Bloom to include these features, even if they are known in the art. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 70 under §103 is improper and should be withdrawn.

Rejections Over U.S. Patent No. 5,926,594 to Song et al.

Claims 1-54 and 64-70 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,926,594 to Song et al. Applicants respectfully traverse these rejections.

In the Office Action, the Examiner provides no basis in view of the prior art for the rejection of the claims as being unpatentable over Song. Rather, the Examiner merely provides a recitation of some of the features disclosed in Song but has made no effort whatsoever to establish how Song renders obvious the claimed subject matter. In this regard, each of the independent claims recites a feature not disclosed by Song. Not only has the Examiner failed to establish the existence of the features in the art, but the Examiner has failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such features. Therefore, the Examiner has failed to establish a *prima facie* case of obviousness, such that the rejections are improper and should be withdrawn, as discussed below.

Song is generally directed to an arrangement for connecting optical fibers to waveguides such as integrated optical chips, by moving the optical fibers into the waveguides. As shown in Fig. 2 and described in col. 10, lines 17-36 of Song, an integrated optical chip 12 is held at a central work station 84 in a suitable retainer. Optical fiber clamps/holders 28, 30 and 32 are

coupled to alignment robots 48, 50 and 52 which provide orthogonal movements about the x, y and z axes and rotational movements about the x-axis.

Claims 1-17

Claim 1 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises a carrier for supporting a connector that, responsive to a control signal, is moveable in at least two axial directions and is rotatable, and a support for holding the fiber so that the fiber portion is available to receive the connector.

Applicants respectfully traverse the rejection of claim 1 over Song. In the Office Action, the Examiner has provided no basis for the rejection of claim 1 as being unpatentable under §103 in view of Song. Song does not teach or suggest a carrier for supporting a connector that, responsive to a control signal, is moveable in at least two axial directions and is rotatable as recited in claim 1. For the sake of argument only, even if, as contended in the Office Action, it would have been obvious to place a connector rather than a waveguide onto the end of the optical fiber, which is not conceded by Applicants, the waveguide supporter (central workstation 84) disclosed in Song is not moveable or rotatable. In the Office Action, not only has the Examiner failed to establish that the prior art includes a connector support that is moveable in two axial directions and is rotatable, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such a feature. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 1 under §103 is improper and should be withdrawn.

Claims 2-18 depend from claim 1 and are patentable for at least the same reasons.

Claims 18-24

Claim 18 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a carrier for supporting a connector that, responsive to a control signal, orients the connector into a position that corresponds with the alignment of the polarization maintaining axis of the fiber.

Applicants respectfully traverse the rejection of claim 18. In the Office Action, the Examiner has provided no basis for the rejection of claim 18 as being unpatentable under §103 in

view of Song. Song does not teach or suggest a carrier that, responsive to a control signal, orients a connector into a position that corresponds with the alignment of the polarization maintaining axis of the fiber as recited in claim 18. As discussed above, Song discloses a waveguide supporter that is not moveable or rotatable. In the Office Action, not only has the Examiner failed to establish that the prior art includes a carrier as recited in claim 18, but the Examiner has also failed to establish any motivation based on teachings or suggestions in the prior art to modify Song to include such a feature. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 18 as being unpatentable over Song under §103 is improper and should be withdrawn.

Claims 19-24 depend from claim 18 and are patentable for at least the same reasons.

Claims 25-28

Claim 25 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a carrier for supporting a connector that, responsive to a control signal, is moveable in a fiber working area, and a heater, responsive to a control signal, that directs heat into the fiber working area to at least pre-set an adhesive that has been included in the connector.

Applicants respectfully traverse the rejection of claim 25 over Song. Song does not teach or suggest a carrier for supporting a connector as recited in claim 25. For the sake of argument only, even if the central workstation 84 of Song is considered to be a carrier for supporting a connector, which is not conceded, the central workstation is not moveable. Song also does not teach or suggest a heater as recited in claim 25. In the Office Action, not only has the Examiner failed to establish that the prior art includes a carrier and a heater as recited in claim 25, but the Examiner has also failed to establish any motivation based on any teachings or suggestions from the prior art to modify Song to include such features. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 25 under §103 is improper and should be withdrawn.

Claims 30-38 depend from claim 25 and are patentable for at least the same reasons.

Claims 29-38

Claim 29 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a source for supplying a connector at a connector supply location, a heater, and a carrier that is adapted to support the connector and that is moveable, responsive to one or more control signals, to the connector supply location, an adhesive dispensing location and a heating location.

Applicants respectfully traverse the rejection of claim 29. Song does not disclose either a source for supplying a connector at a connector supply location, a heater, or a carrier that is adapted to support the connector and that is moveable as recited in claim 29. In the Office Action, not only has the Examiner failed to establish that the prior art includes these features as recited in claim 29, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such features. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 29 under §103 is improper and should be withdrawn.

Claims 30-38 depend from claim 29 and are patentable for at least the same reasons.

Claims 39-43

Claim 39 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a hold down member, responsive to a control signal, that is moveable from a first position that holds a tray in a receiving area to a second position that releases the tray in the receiving area.

Applicants respectfully traverse the rejection of claim 39. Song does not disclose a hold down member, responsive to a control signal, that is moveable from a first position that holds a tray in a receiving area to a second position that releases the tray in the receiving area as recited in the claim. The Examiner has not established that the prior art includes this feature, nor has the Examiner established any motivation based on the teachings and suggestions from the prior art to modify Song to include such a feature. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness such that the rejection of independent claim 39 under §103 is improper and should be withdrawn.

Claims 40-43 depend from claim 39 and are patentable for at least the same reasons.

Claims 44-49

Claim 44 is directed to an automated station for attaching a connector in a pre-determined orientation to a portion of a fiber. The station comprises, *inter alia*, a carrier adapted to support a connector, wherein the carrier, responsive to a control signal, is moveable to position the connector in a pre-determined orientation.

Applicant respectfully traverses the rejection of claim 44. For the sake of argument only, even if central workstation 84 is considered to be a carrier adapted to support a connector, which is not conceded, the central workstation is neither moveable to position the connector in a pre-determined orientation, nor is it responsive to a control signal as recited in claim 44. In the Office Action, the Examiner has failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include a carrier as recited in claim 44. Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 44 under §103 is improper and should be withdrawn.

Claims 45-49 depend from claim 44 and are patentable for at least the same reasons.

Claims 50-54

Claim 50 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a carrier adapted to support a connector that, responsive to a control signal, is moveable along a fiber portion in a path including a fiber support. The fiber support, responsive to a control signal, moves out of the path of the carrier after the carrier has been moved a predetermined length along the path.

Applicants respectfully traverse the rejection of claim 50. For the sake of argument only, even if central workstation 84 of Song is considered to be a carrier adapted to support a connector, which is not conceded, the central workstation is neither moveable nor responsive to a control signal as recited in claim 50. Song also does not teach or suggest a fiber support that, responsive to a control signal, moves out of the path of the carrier after the carrier has been moved a pre-determined length along the path as recited in claim 50. In the Office Action, not only has the Examiner failed to establish that the prior art includes a carrier and a fiber support as recited in the claim, but the Examiner has also failed to establish a motivation based on any

teachings or suggestions from the prior art to modify Song to include such features.

Accordingly, the Examiner has failed to set forth a *prima facie* case of obviousness, such that the rejection of independent claim 50 under §103 is improper and should be withdrawn.

Claims 51-54 depend from claim 50 and are patentable for at least the same reasons.

Claim 64

Claim 64 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, means for supporting a connector that, responsive to a control signal, is moveable in at least two axial directions and is rotatable.

Applicants respectfully traverse the rejection of claim 64. For the sake of argument only, even if central workstation 84 of Song is considered to be means for supporting a connector, which is not conceded, the central workstation is not responsive to a control signal, is not moveable, and is not rotatable as recited in claim 64. In the Office Action, not only has the Examiner failed to establish that the prior art includes means for supporting a connector as recited in the claim, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such a feature. Accordingly, the Examiner has failed to set forth a *prima facie* of obviousness, such that the rejection of independent claim 64 under §103 is improper and should be withdrawn.

Claim 65

Claim 65 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, means for supporting a connector that, responsive to a control signal, orients the connector into a position that corresponds with the alignment of the polarization maintaining axis of a fiber.

Applicants respectfully traverse the rejection of claim 65. For the sake of argument only, even if the central workstation 84 of Song is considered to be means for supporting a connector, which is not conceded, the workstation is neither moveable nor responsive to a control signal to orient a connector into a position that corresponds with the alignment of the polarization maintaining axis of a fiber as recited in claim 65. In the Office Action, not only has the Examiner failed to establish that the prior art includes means for supporting a connector as

recited in the claim, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such a feature. Accordingly, the Examiner has failed to set forth a *prima facie* of obviousness, such that the rejection of independent claim 65 under §103 is improper and should be withdrawn.

Claim 66

Claim 66 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, means for supporting a connector that, responsive to a control signal, is moveable in a fiber working area, and means, responsive to a control signal, that directs heat into the fiber working area to at least pre-set an adhesive that has been included in the connector.

Applicants respectfully traverse the rejection of claim 66. For the sake of argument only, even if the central workstation 84 of Song is considered to be means for supporting a connector, which is not conceded, the workstation is neither moveable nor responsive to a control signal to move as recited in claim 66. There is also no teaching or suggestion in Song of means that directs heat into the fiber working area to at least pre-set an adhesive that has been included in the connector as further recited in claim 66. In the Office Action, not only has the Examiner failed to establish that the prior art includes means for supporting a connector and means that directs heat as recited in the claim, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such features. Accordingly, the Examiner has failed to set forth a *prima facie* of obviousness, such that the rejection of independent claim 66 under §103 is improper and should be withdrawn.

Claim 67

Claim 67 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, a source for supplying a connector at a connector supply location and a heater for at least pre-setting the adhesive filled connector at a heating location. The station also comprises means for supporting the connector that is moveable, responsive to one or more control signals, to the connector supply location, an adhesive dispensing location and the heating location.

Applicants respectfully traverse the rejection of claim 67. Song does not teach or suggest a source for supplying a connector at a connector supply location as recited in claim 67. Song also does not teach or suggest a heater for at least pre-setting an adhesive filled connector at a heating location as recited in claim 67. Song also does not teach or suggest means for supporting a connector that is moveable to a connector supply location and a heating location as recited in the claim. In the Office Action, not only has the Examiner failed to establish that the prior art includes these features as recited in claim 67, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such features. Accordingly, the Examiner has failed to set forth a *prima facie* of obviousness, such that the rejection of independent claim 67 under §103 is improper and should be withdrawn.

Claim 68

Claim 68 is directed to an automated station for attaching a connector to a portion of a fiber. The station comprises, *inter alia*, means for holding a tray in a receiving area that, responsive to a control signal, is moveable from a first position that holds the tray in a receiving area to a second position that releases the tray in the receiving area.

Applicants respectfully traverse the rejection of claim 68. Song does not disclose means for holding a tray in a receiving area that, responsive to a control signal, is moveable from a first position that holds the tray in a receiving area to a second position that releases the tray in the receiving area as recited in claim 68. In the Office Action, not only has the Examiner failed to establish that the prior art includes means for holding a tray as recited in claim 68, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such a feature. Accordingly, the Examiner has failed to set forth a *prima facie* of obviousness, such that the rejection of independent claim 68 under §103 is improper and should be withdrawn.

Claim 69

Claim 69 is directed to an automated station for attaching a connector in a pre-determined orientation to a portion of a fiber. The station comprises, *inter alia*, means for supporting a

connector that, responsive to a control signal, is moveable to position a connector in a pre-determined orientation.

Applicants respectfully traverse the rejection of claim 69. For the sake of argument only, even if central workstation 84 of Song is considered to be means for supporting a connector, which is not conceded, the central workstation is neither moveable to position the connector in a predetermined orientation, nor is it responsive to a control signal as recited in claim 69. Song also does not teach or suggest means for supporting a connector that, responsive to a control signal, is moveable to position a connector in a pre-determined orientation as recited in claim 69. In the Office Action, not only has the Examiner failed to establish that the prior art includes means for supporting a connector as recited in the claim, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such a feature. Accordingly, the Examiner has failed to set forth a *prima facie* of obviousness, such that the rejection of claim 69 under §103 is improper and should be withdrawn.

Claim 70

Claim 70 is directed to an automated station for attaching a connector to a portion of a fiber, the station comprises *inter alia*, means for supporting a connector that, responsive to a control signal, is moveable along a fiber portion in a path including means for holding a fiber. The means for holding the fiber, responsive to a control signal, moves out of the path of the means for supporting after the means for supporting has been moved a predetermined length along the path.

Applicants respectfully traverse this rejection. Song does not teach or suggest means for supporting a connector that, responsive to a control signal, is moveable along a fiber portion in a path including means for holding a fiber as recited in claim 70. Song also does not teach or suggest means for holding a fiber that moves out of the path after the means for supporting has moved a predetermined length along the path as recited in claim 70. In the Office Action, not only has the Examiner failed to establish that the prior art includes these features as recited in claim 70, but the Examiner has also failed to establish a motivation based on any teachings or suggestions from the prior art to modify Song to include such features. Accordingly, the

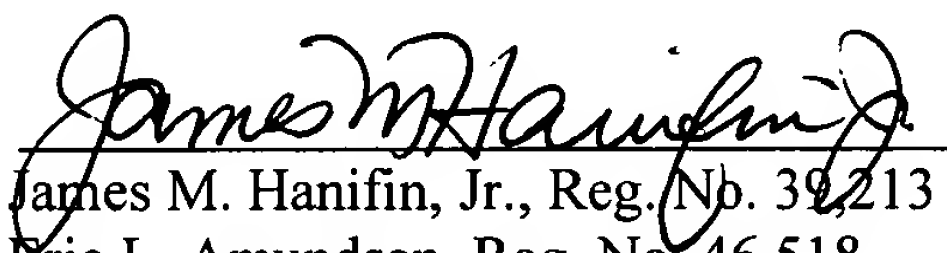
Examiner has failed to set forth a *prima facie* of obviousness, such that the rejection of independent claim 70 under §103 is improper and should be withdrawn.

CONCLUSION

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the undersigned at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Respectfully submitted,

By: 
James M. Hanifin, Jr., Reg. No. 39,213
Eric L. Amundsen, Reg. No. 46,518
Wolf, Greenfield & Sacks, P.C.
600 Atlantic Avenue
Boston, Massachusetts 02210-2211
Telephone: (617) 720-3500

Docket No.: K0480.70003US00
Date: April 6, 2004
x04/06/04x